## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE: \* CASE NUMBER: 10-0598 BKT

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PEDRO MARCOS DIAZ

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DEBTOR(S) \* CHAPTER 13 (ASSET CASE)

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## DEBTORS REPLY TO SCOTIABANK- MORTGAGE DIVISION MOTION FOR RELIEF OF STAY UNDER 362

## TO THE HONORABLE COURT:

COMES now Debtor(s)represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

- 1. That on June 29th, 2010, the creditor Scotiabank filed a Motion for Relief From Stay Under 362 based on the fact that debtor was in arrears for two alleged months.
- 2. Debtor is current with his mortgage payments. Enclosed Please find copy of all payments from the filing of the petition.
- 3. Based on the abovementioned, it is debtor's contention that Scotiabank otion turns into a moot one.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Scotiabank Division Motion for Relief of Stay under 362.

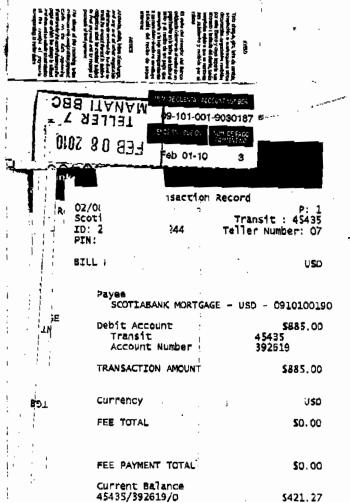
In San Juan, Puerto Rico, this 30th, day of July, 2010.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee José R. Carrión, Esq., US Trustee Monsita Lecaroz Arribas, Vanessa Torres, Esq. and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

## RESPECTFULLY SUBMITTED

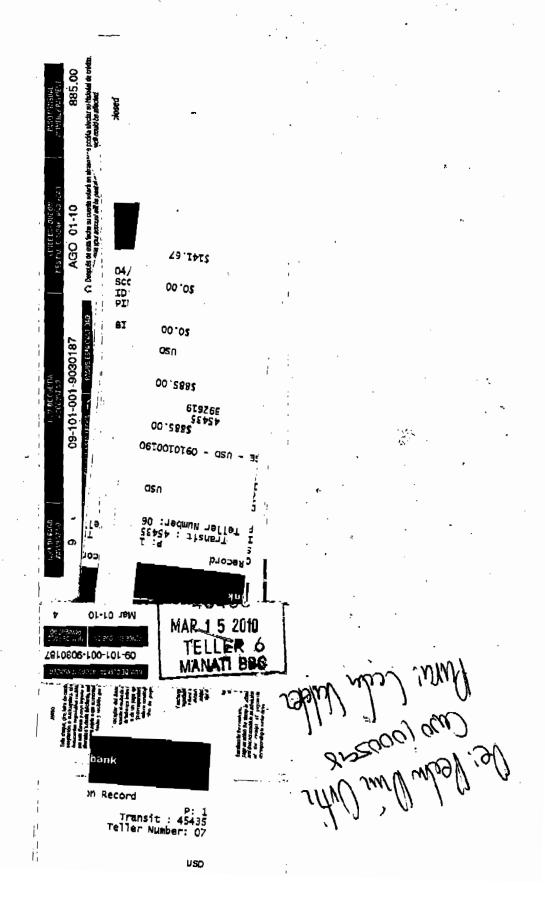
/S/Marilyn Valdes Ortega MARILYN VALDES ORTEGA

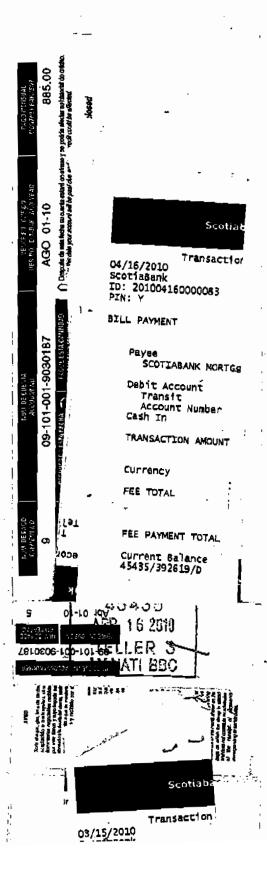
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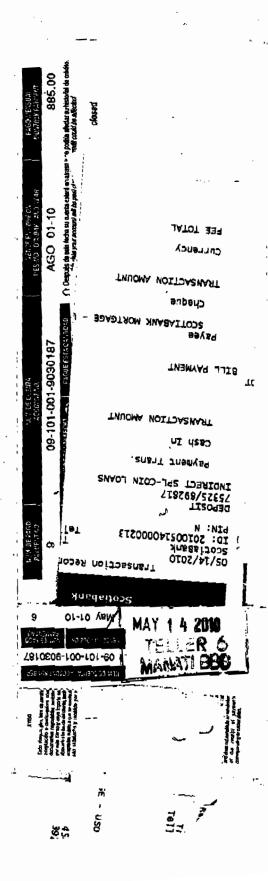
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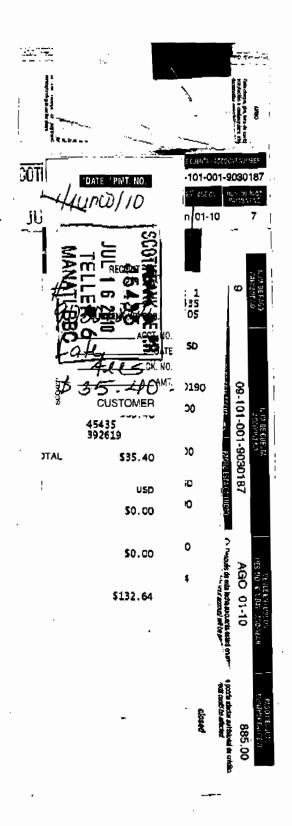




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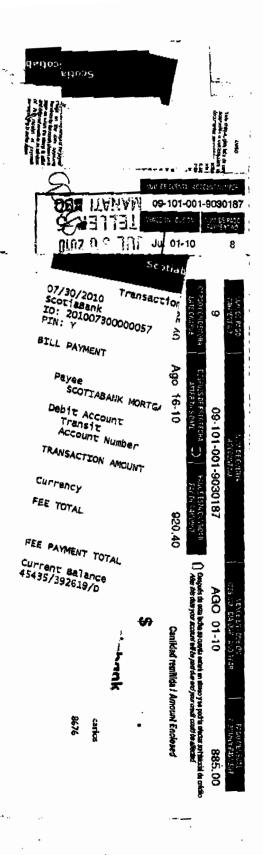


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Label Matrix for local noticing 0104-3 Case 10-00598-BKT13 District of Puerto Rico Old San Juan Fri Feb 19 08:07:45 AST 2010 BANCO POPULAR DE PR

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

INTERNAL REVENUE SERVICE
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(u) DIAZ ORTIZ, PEDRO MARCOS

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